

**FILED**  
DISTRICT COURT OF GUAM

MAR - 2 2006

MARY L.M. MORAN  
CLERK OF COURT

CEspinosa.RGT

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF GUAM**

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
vs. )  
 )  
CHRISTOPHER M. ESPINOSA )  
and BRIAN WILLIAM ELM, )  
 )  
Defendants. )

CRIMINAL CASE NO. 05-00053

**UNITED STATES' MOTION  
TO RELEASE GRAND JURY  
TRANSCRIPTS**


COMES NOW the United States and moves this Honorable Court for an order allowing the release to defense counsels, G. Patrick Civile and Curtis Van de Veld, of the testimony of the witnesses who appeared before the Grand Jury in this matter and who will testify at trial. Presently, these transcripts are sealed pursuant to Federal Rules of Criminal Procedure 6(e); counsel is entitled to receive them after the witnesses' testimony pursuant to 18 U.S.C. § 3500.

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1 This motion is made for the reason that release of this document prior to the testimony of  
2 the witnesses will expedite the timely conduct of the trial itself.

3 Respectfully submitted this 2nd day of March, 2006.

4 LEONARDO M. RAPADAS  
5 United States Attorney  
6 Districts of Guam and NMI

7 By:   
8 RUSSELL C. STODDARD  
9 First Assistant U.S. Attorney  
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